

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	
)	Chapter 11
CIRCUIT CITY STORES, INC., et al.,)	
)	Case No. 08-35653-KRH
Debtors.)	
)	Jointly Administered

**RESPONSE OF ROBYN N. DAVIS TO
DEBTORS' SIXTY-NINTH OMNIBUS OBJECTION TO CLAIMS**

Robyn N. Davis ("Ms. Davis") hereby responds to the Debtors' Sixty-Ninth Omnibus Objection Claims (Disallowance of Certain Administrative Claims) (the "Sixty-Ninth Omnibus Objection") as follows:

BACKGROUND

1. On November 10, 2008 ("Petition Date"), the above-captioned debtors and debtors-in-possession (collectively, "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code ("Bankruptcy Code").
2. The Debtors continue to operate their businesses and to manage their properties as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
3. No trustee or examiner has been requested or appointed in this case.
4. The court established January 30, 2009, as the general bar date, and June 30, 2009, as the administrative bar date.

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5. On December 11, 2008, Ms. Davis filed a proof of claim in the amount of \$14,214.24. Of that amount, Ms. Davis designated \$10,950 as priority claim pursuant to Section 507(a)(4) of the Bankruptcy Code. *See* POC #1756.

6. On June 29, 2009, Ms. Davis filed an administrative expense claim in the amount of \$14,214.24. *See* POC #14383.

7. On or about February 19, 2010, the Debtors filed the Sixty-Ninth Omnibus Objection. In the Sixty-Ninth Objection, the Debtors seek entry of an order reclassifying certain administrative claims as general unsecured claims and then disallowing the reclassified claims as late-filed and duplicative. *See generally* Sixty-Ninth Objection.

8. Ms. Davis' proof of claim #14383 is included among those claims the Debtors seek to reclassify and disallow pursuant to the Sixty-Ninth Objection. *See* Sixty-Ninth Objection, Ex. B & Ex. C.

9. Ms. Davis admits that proof of claim #14383 is duplicative of proof of claim #1756, and therefore agrees that proof of claim #14383 should be disallowed as duplicative.

10. Ms. Davis objects to the Debtor's contention that the entire amount of proof of claim #14383 should be reclassified as a general unsecured claim; rather \$10,950.00 of that amount should be reclassified as a priority claim and \$3,264.24 should be reclassified as a general unsecured claim. *See* Sixty-Ninth Objection, Ex. C. However, because the amounts properly classified as a priority claim were classified as such in proof of claim #1756, Ms. Davis files this Objection out an abundance of caution to preserve her argument as it relates to proof of claim #1756 for such time as it is necessary.

WHEREFORE, Ms. Davis respectfully requests that the Court enter an order sustaining the Sixty-Ninth Objection with respect to her proof of claim #14383 without prejudice to

Ms. Davis' proof of claim #1756, and granting Ms. Davis such further and additional relief as the Court may deem just and proper.

Dated: March 18, 2010

CHRISTIAN & BARTON, LLP

/s/ Michael D. Mueller

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March, 2010, I caused a copy of the foregoing to be served by electronic means through the ECF system.

/s/ Michael D. Mueller

Michael D. Mueller